

1 MICHELLE BECKWITH  
2 Acting United States Attorney  
3 MATHEW W. PILE  
4 Associate General Counsel  
5 Office of Program Litigation, Office 7  
6 Office of the General Counsel  
7 Social Security Administration  
8 TIMOTHY A. RAZEL, NYSBN 4742573  
9 Special Assistant United States Attorney  
10 Social Security Administration  
11 6401 Security Boulevard  
12 Baltimore, MD 21235  
13 Tel.: (212) 264-0534  
14 Email: [Timothy.Razel@ssa.gov](mailto:Timothy.Razel@ssa.gov)  
15 Attorneys for Defendant

16 **UNITED STATES DISTRICT COURT**  
17 **EASTERN DISTRICT OF CALIFORNIA**

18  
19 LUIS ORTIZ, } Case No.: 2:21-cv-01563-KJM-DMC  
20 Plaintiff, } STIPULATION AND ORDER FOR AN  
21 v. } EXTENSION OF TIME  
22 COMMISSIONER OF SOCIAL SECURITY, }  
23 Defendant. }  
24

25 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the  
26 parties, through their respective counsel of record, that the time for Defendant to respond to  
27 Plaintiff's Motion for Attorney Fees Pursuant to the Equal Access to Justice Act (EAJA) (ECF  
28 No. 30) be extended thirty (30) days from May 27, 2025, up to and including June 26, 2025.  
This is Defendant's first request for an extension.

Defendant requests this extension because of heavier than usual workloads borne by the  
undersigned counsel for Defendant. This includes being reassigned multiple matters from other  
attorneys who have departed the Defendant agency. For some of these, the merits deadlines had  
already been extended. Additionally, the undersigned was assigned to handle an in-person

1 evidentiary hearing held on May 15, 2025, which required travel outside of his home city and  
2 absence from the office for an entire day. Moreover, the undersigned has seven pending  
3 deadlines for merits briefs in the next 30 days.

4 Accordingly, additional time is needed to formulate Defendant's response to Plaintiff's  
5 Motion.

6 The parties further stipulate that the Court's Scheduling Order shall be modified  
7 accordingly.

8 Respectfully submitted,

9 Dated: May 23, 2025

/s/ Eddy Pierre Pierre

(\*as authorized via e-mail on May 23, 2025)  
10 EDDY PIERRE PIERRE  
11 Attorney for Plaintiff

12 Dated: May 23, 2025

13 Michelle Beckwith  
14 Acting United States Attorney  
15 MATHEW W. PILE  
Associate General Counsel  
Social Security Administration

16 By:

/s/ Timothy A. Razel  
17 TIMOTHY A. RAZEL  
Special Assistant U.S. Attorney  
18 Attorneys for Defendant

19

20

21

22

23

24

25

26

27

28

## **ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including June 26, 2025, to respond to Plaintiff's Motion for Attorney Fees Pursuant to the EAJA.

Dated: May 28, 2025

  
DENNIS M. COTA  
UNITED STATES MAGISTRATE JUDGE